

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Application by SBC Communications Inc.,)
Southwestern Bell Telephone Company,) CC Docket No. 00-65
And Southwestern Bell Communications)
Services, Inc. d/b/a Southwestern Bell Long)
Distance for Provision of In-Region)
InterLATA Services in Texas)

JOINT AFFIDAVIT OF DEBBIE KOCH AND CARRIE J. SMITH

STATE OF TEXAS)
)
COUNTY OF DALLAS)

*** Indicates Redacted Data

PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND

I, Debbie Koch, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. "My name is Debbie Koch. My title is Customer Care Manager for NEXTLINK Texas, Inc ("NEXTLINK"). My business address is 1300 W. Mockingbird Lane, Suite 200, Dallas, Texas 75247.
2. I am Customer Care Manager for NEXTLINK Texas, Inc. I have served in this role for six months and have served in various marketing, market development, and process functions in telecommunications since 1996. I received a Bachelor of Science degree from Messiah College in 1992, followed by a Masters of Arts degree from Pensacola Christian College in 1993.

I, Carrie J. Smith, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

3. "My name is Carrie J. Smith. My title is Provisioning Manager for NEXTLINK Texas, Inc. My business address is 1300 W. Mockingbird Lane, Suite 200, Dallas, Texas 75247.
4. My responsibilities include managing the order flow process for the Dallas market through order entry, circuit design, and provisioning of orders to Southwestern Bell Telephone Company ("SWBT"). I have worked for NEXTLINK Texas for three months. In total, I have 14 years of experience in the local telecommunications industry, including 13 years of employment with Regional Bell Operating Companies. Prior to joining NEXTLINK, I worked at SWBT as one of the first service representatives in the then newly formed Local Service Center ("LSC") from July 1997 to January 1999.

PURPOSE OF AFFIDAVIT

5. "The purpose of our affidavit is to update the Commission on the current status of various service provisioning and operational issues between NEXTLINK and SWBT, in the wake of SBWT's decision to supplement its original 271 application and restart the 90 day federal statutory review process.

TWO STEPS FORWARD, ONE STEP BACK

6. While NEXTLINK recognizes that SWBT has made some progress in improving customer service, SWBT, since its initial filing, has failed to automate any of the service affecting manual processes highlighted by NEXTLINK in its previous filings before this Commission. Service problems relating to SWBT's inadequate legacy ordering and provisioning systems thus continue to remain a reality in the local telecommunications market in Texas. Nevertheless, as a direct result of this Commission's diligent effort in

reviewing SWBT's initial 271 application, NEXTLINK has experienced some recent improved performance by SWBT in certain limited areas.

7. For example, SWBT has improved its staffing levels both in its account management and LSC groups. SWBT has now provided NEXTLINK with a new account manager who is shared with only one other CLEC, and NEXTLINK has been informed that it will soon be assigned its own dedicated account manager. With respect to the LSC, NEXTLINK has been assigned a team of "reps" that have been adequately trained to perform the necessary manual workarounds resulting from the on-going inherent deficiencies in SWBT's ordering and provisioning legacy systems. Following NEXTLINK's recent 271 filing at the FCC, SWBT has permitted NEXTLINK's provisioning team to interface with the specific SWBT representative that has direct responsibility on a particular work matter. Moreover, in the light of recent regulatory scrutiny, it now appears that SWBT has initiated a process at its LSC that allows SWBT to manually coordinate related "RPON" service orders that typically fall out into the "Folders" system.
8. While NEXTLINK is encouraged by SWBT's recent efforts to achieve parity performance in certain limited areas, there is no assurance that SWBT will maintain this level of service if it receives 271 interLATA authority from the FCC. For example, NEXTLINK orders have just recently been assigned to a new supervisor at the LSC. This supervisor has no prior telecommunications background and that inexperience may be the root cause as to why service for CLECs at the LSC is beginning to deteriorate. Such personnel decisions thus highlight how quickly service performance can fluctuate based on strategic personnel placement.

9. NEXTLINK fears that without stringent backsliding requirements, SWBT may, in Texas, follow the same path that Bell Atlantic took in New York by degrading its service quality after obtaining 271 long distance relief. SWBT's performance, for example, in coordinating related RPONs relies primarily on effective internal SWBT coordination and communication, and this process is not captured today in any state mandated performance measure report. The lack of enforceable performance measures will make it nearly impossible for federal and state regulators to detect and correct any potential SWBT backsliding in these service-provisioning areas.

UNRESOLVED SERVICE PROBLEMS

10. Irrespective of SWBT's recent improvement in certain areas, SWBT continues to provide NEXTLINK and other CLECs with poor performance in several critical operational areas.

FOCs

11. Upon implementing an EDI interface with SWBT, NEXTLINK now appears to be receiving FOCs on a more timely basis, however, SWBT's performance data indicates that the benchmark was not still not met for NEXTLINK's data in Performance Measure 94b: "Percent Firm Order Confirmations (FOCs) received within 'x' Hours – EDI" in four categories during February and March¹

¹ See, SWBT Performance Measurement Tracking Report, 94b "Percent Firm Order Confirmations" (FOCs) received within "x" hours-EDI Texas, NEXTLINK proprietary data for February and March 2000. Missed benchmarks include "Residence and Simple Business With Loop LNP Only (1-19) for February, "Residence and Simple Business with Loop (1-19)" for February and March, and "LNP Complex Business (1-19 Lines)" for March.

Jeopardy Notification after FOC

12. While NEXTLINK appears to receive initial FOCs from SWBT on a timely basis, it continues to experience a high rate of subsequent jeopardy notices on those FOCs. For example, in February, NEXTLINK received *** jeopardy notices (equaling *** percent of NEXTLINK's total LSRs) on FOCs received in Dallas. In March, NEXTLINK received *** jeopardy notices (equaling *** percent of NEXTLINK's total LSRs) on FOCs received in Dallas. From our experience, these jeopardy notices many times inform NEXTLINK that no SWBT facilities are available for order completion. Many of these SWBT jeopardy notices result in service problems for our end user customers because they are typically forwarded to NEXTLINK so close in time to the scheduled delivery date that we have little, if any, time to prepare an alternate service solution for our customers.

Lack of Facilities for Confirmed Orders

13. NEXTLINK continues to face serious obstacles in providing timely service to customers because of the recurring incidences of lack of SWBT facilities (i.e., "check facilities" orders, or "CF" orders) in the ordering and provisioning process. While SWBT has told NEXTLINK, on an informal basis, that it has addressed this issue by implementing an internal "CF" group in the LSC whose primary responsibility will be to focus on screening for CF issues early in the ordering process, SWBT's "lack of facilities" problems continue to persist.²

² At this moment, NEXTLINK is unaware of any SWBT accessible letter or similar formal announcement regarding any attempt to resolve the service problems associated with the "lack of facilities" issues.

14. NEXTLINK had previously raised this issue in response to SWBT's initial 271 filing.³ In our previous 271 comments, we noted that NEXTLINK's internal data collection program revealed that SWBT's performance measurement data failed to accurately capture all of the "lack of facilities" incidents between our two companies. Discrepancies unfortunately continue to exist in SWBT's most recently filed performance measurement data. While SWBT's recorded incidents for February appear to match NEXTLINK's data, SWBT's March data actually recorded more occurrences than NEXTLINK had recorded for the same time period (SWBT reported *** CF occurrences in March versus *** occurrences recorded by NEXTLINK).⁴ On the other hand, in contrast to NEXTLINK's own data, SWBT fails to record any delays regarding DS-1 loops in Dallas during the month of March. The apparent discrepancies between the measures NEXTLINK has tracked and SWBT's reported data, once again, call into question the accuracy and reliability of SWBT's underlying performance measurement tracking data.
15. Moreover, the Commission should be cognizant of performance measurement data that reveals the impact of SWBT's lack of facilities on NEXTLINK's operations, and a lack of parity between SWBT's treatment of NEXTLINK and SWBT's service performance for its own operations. For example, performance measure 60(a) ("Percent Missed Due Dates Due to Lack of Facilities") for NEXTLINK, reveals a lack of parity service for 5db loops and BRI loops for the Dallas market in March. A similar lack of parity exists for DS1 loops as indicated

³ See Lea Barron NEXTLINK Affidavit, filed January 31, 2000.

⁴ See, SWBT Performance Measurement Tracking Report, 61 "Average Delay Days Due to Lack of Facilities," Dallas, Ft. Worth, NEXTLINK proprietary data for March 2000.

by SWBT's data filed for the Dallas market in January and February 2000. In addition, data for performance measure 61(a) ("Average Delay Days Due to Lack of Facilities") demonstrate a lack of parity service for 5 db loops in Dallas during the month of March.

Premature Disconnects

16. NEXTLINK continues to experience premature disconnects during conversions. For example, as of this date, NEXTLINK has had *** out of *** conversions prematurely disconnected in the month of April. The percentage for premature disconnects therefore already exceeds the established monthly 2% benchmark for PM 114. One of the outages that occurred this month lasted approximately ***, and the other outage lasted over ***. Premature disconnects resulting in extended outages represent a critical SWBT service problem that continues to plague CLECs and must be resolved prior to SWBT receiving 271 relief. Apparently, SWBT's internal OSS's must be manually updated separately to prevent disconnects when due dates change. NEXTLINK believes, however, that automating this process would prevent many instances of premature disconnects.

CONCLUSION

17. Little has changed since SWBT filed its initial 271 application in this proceeding, SWBT has failed to automate any of the manual processes that NEXTLINK previously identified as the primary cause for service provisioning problems in Texas. Even in the limited areas where SWBT's underlying performance has improved, NEXTLINK has no assurance that such performance will continue or that any degradation in service quality will be captured and/or detected by existing performance measurements. Finally,

discrepancies between SWBT and NEXTLINK data once again call into question the accuracy and credibility of SWBT's claims regarding its provisioning of service to CLECs at parity with the service it provides to itself and other affiliated entities.

This concludes our affidavit.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on April 25, 2000

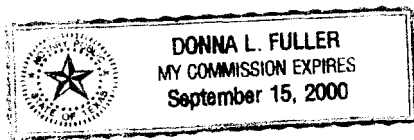
Carrie J. Smith
Carrie J. Smith

STATE OF TEXAS)
COUNTY OF DALLAS)

Subscribed and sworn to before me

This 25 day of April, 2000.

Donna L. Fuller
Notary Public



Executed on April 25, 2000

Debbie Koch
Debbie Koch

STATE OF TEXAS)
COUNTY OF DALLAS)

Subscribed and sworn to before me

This 25th day of April, 2000.

Donna L. Fuller
Notary Public

